

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
The State of Louisiana)	PS Docket 06-229 and WT 96-86
Safety Network in the 700 MHz Band)	
)	
Request for Waiver of the Commission's Rules to)	
Narrowband the 700 MHz Radio Frequency Spectrum)	

**COMMENTS OF THE
ARKANSAS INTEROPERABLE COMMUNICATIONS COMMITTEE**

These comments are filed by the Arkansas Interoperable Communications Executive Committee in support of the request from the State of Louisiana for Expedited Action on their Request for Waiver, concerning the date for required narrowbanding of the 700 MHz public safety radio frequencies to 6.25 efficiency.

Background

Arkansas operates a system is very similar to the Louisiana Wireless Information Network (LWIN). The Arkansas Wireless Information Network (AWIN) is also a statewide public safety communications system. AWIN is based on a digital 700/800 MHz system using the Association of Public Safety Communication Officials (APCO) Project 25 (P-25) standard. AWIN, as a multi-phased program, leveraged existing infrastructure and approximately \$70 million in taxpayer dollars to create a reliable and redundant communication system for Arkansas' first responders.

Since June of 2007 AWIN has grown into a truly multi-jurisdictional, multi-disciplinary system. Over 21,400 subscribers representing 900 public safety agencies use the AWIN network for emergency communications. Local public safety agencies represent the largest user groups, representing 831 agencies currently on the system. The use of AWIN is split about evenly between disciplines.

As southern states Arkansas and Louisiana share much more than similar public communications systems. Just as Louisiana, Arkansas experiences severe weather in the forms of tornados, and flooding, as well as the aftermath of hurricanes. Additionally, ice storms occur with some regularity in Arkansas, which leads to serious transportation issues and power outages. The overriding commonality here is that the events described above require efficient and effective interoperable communications that enables the first responder community to serve the health and welfare of the citizens.

Arkansas and Louisiana share much more than a border and similar weather. We stand ready to support one another in the event of a catastrophic event, as evidenced by the recent installation of interoperability gateway equipment near the state border. This equipment allows for LWIN and AWIN to be linked together and provides direct communications between state emergency operations centers.

Discussion

The State of Louisiana has made significant efforts to provide a public safety communications system that meets the needs of the people of their State. Time and time again the LWIN system has been depended on

to ensure the health and well-being, not just of the people of Louisiana, but those in other Gulf Coast States.

The State of Arkansas supports the Louisiana request for the following reasons:

1. **The D-Block has been now been allocated to public safety and with that action the rules and deadlines associated with the 700 MHz spectrum should be re-evaluated.** The Middle Class Tax Relief legislation signed by President Obama in February provided the D-Block to the public safety community. This action significantly impacts the ideas of flexibility and efficient use of the 700 MHz spectrum. It is reasonable to review the existing rules and deadlines that were put in place 10 years ago and to ensure that new rule-making meets the needs of the changing communications environment.
2. **The interoperability achieved by the State of Louisiana should not be put in jeopardy by requiring the state to comply with the narrowbanding requirement.** Should the Greater New Orleans Homeland Security region abandon the LWIN system for a less expensive alternative the impact to statewide interoperability would be devastating. Further this action would be completely opposite to the goal of interoperability that the Department of Homeland Security has set for the nation.
3. **The financial investment that the State of Louisiana has made is significant and should not be wasted.** With the downturn in the economy every state in the nation has seen grant funds diminish; each state realizes that it will have to make good use of existing resources. Requiring that systems operating in the 700 MHz spectrum be narrowbanded will require significant upgrades or replacements, often long before the equipment has reached the end of its service life. This replacement of serviceable equipment, especially when there is no sound reason for such replacement, is wasteful of already scarce taxpayer dollars.
4. **700 MHz frequencies are being used efficiently, there appears to be no congestion and the State is effectively managing the existing 700 MHz frequencies.** The State of Arkansas understands that the Commission undertook the 700 MHz narrowbanding initiative in order to ensure that the spectrum was being used in an efficient and effective manner. However, in areas of the nation where the spectrum is already being successfully managed and there is no channel contention, it seems pointless to require this magnitude of a change when the state and the citizens will not benefit from it.

Conclusion

The Arkansas Interoperable Communications Executive Committee supports the State of Louisiana's request for a waiver in regards to the existing FCC's rules which require 700 MHz systems to achieve a 6.25 kHz equivalency by December 31, 2016.